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FORMS AND INSTRUCTIONS FOR SUBMITTING ELECTRIC TRANSMISSION-RELATED DATA

PREPARED IN SUPPORT OF THE *2009 INTEGRATED ENERGY POLICY REPORT*

COMMISSION REPORT

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Arnold Schwarzenegger, *Governor*

CALIFORNIA ENERGY COMMISSION

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Abstract

These electric transmission forms ask electric transmission system owners in California to provide information to the California Energy Commission on their bulk transmission network and on specific projects identified in their transmission expansion plans, as well as data on anticipated transmission corridor needs. Responses to these data requests will be used to prepare analyses and recommendations for the *2009 Integrated Energy Policy Report* and the *2009 Strategic Transmission Investment Plan*.

Keywords: Electric transmission, transmission corridor, data request, transmission forms and instructions, California electric transmission system owners, *2009 Integrated Energy Policy Report*, *2009 Strategic Transmission Investment Plan*

BACKGROUND

The California Energy Commission (Energy Commission) requests that all electric transmission system owners file specific data on their bulk transmission network and on specific projects identified in their transmission expansion plans, as well as data on anticipated transmission corridor needs. These data will provide a foundation for the analyses and recommendations of the *2009 Integrated Energy Policy Report (IEPR),* as well as the *2009 Strategic Transmission Investment Plan (Strategic Plan)* required by Public Resources Code (PRC) Section 25324. These assessments serve as the foundation for policy recommendations to the Governor, Legislature, and other agencies.

The broad strategic purposes of policies adopted in the Energy Commission's *IEPR* and the *Strategic Plan* are to conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety. PRC Section 25301 directs the Energy Commission to conduct regular assessments of all aspects of energy demand and supply. To carry out these regular assessments of expected and needed electricity supplies, "the Commission shall conduct… (an) assessment of the availability, reliability, and efficiency of the electricity and natural gas infrastructure and systems including, but not limited to…western regional and California electricity and transmission system capacity and use." (PRC Section 25303[a][3]).

In addition, PRC Section 25324 directs the Energy Commission to "adopt a strategic plan for the state's electric transmission grid..." State law directs the Energy Commission to identify in the *Strategic Plan* recommended actions for implementing transmission investments that accomplish one or more of these objectives:

- Ensure reliability.
- Relieve transmission congestion.
- Meet future growth in load and generation, including generation from renewable energy resources.

These objectives identify basic needs to be addressed by transmission investments when alternative strategies (such as local generation, distributed generation, or demand-side management) are inadequate to meet the stated objectives.

On November 17, 2008, Governor Schwarzenegger signed Executive Order S-14-08[1], which establishes a Renewables Portfolio Standard of 33 percent by 2020 for all retail sellers. It also directs state agencies to take all appropriate actions to implement this target in all regulatory proceedings, including siting, permitting, and procurement for renewable energy power plants and transmission lines. Furthermore, it directs the Energy Commission to work with other

[1] Office of the Governor of the State of California, Executive Order S-14-08, November 17, 2008, < http://gov.ca.gov/executive-order/11072/>, posted November 17, 2008, accessed November 18, 2008.

Renewable Energy Transmission Initiative[2] (RETI) stakeholders to complete a report by March 31, 2009, that identifies potential routes and interconnection points for new transmission lines. The RETI results, along with the electric transmission system owners' responses to the data requests herein, will support the analyses and recommendations of the *2009 IEPR* and the *2009 Strategic Plan*.

Furthermore, PRC Sections 25330 through 25341 established the Energy Commission's Transmission Corridor Designation Program to provide a link between long-term transmission expansion planning and bulk transmission line permitting. The Energy Commission's Transmission Corridor Designation Program is conducted in two phases. During biennial proceedings to update the *Strategic Plan*, the Energy Commission identifies the basic needs, objectives, and planning timeframes for new transmission infrastructure. In the second phase of the program, the Energy Commission reviews applications to determine the need for a proposed corridor on non-federal lands and the feasibility of the corridor to accommodate the siting of a new transmission line or lines and related substations or other facilities, including the preparation of a program environmental impact report (PEIR).

The Energy Commission's assessment of need for a transmission corridor is based on a finding that it conforms with the state's needs and objectives as stated in the most recently adopted *Strategic Plan*. In the most recently adopted (2007) *Strategic Transmission Investment Plan*, the Energy Commission listed the following state needs and objectives for transmission corridors:

- Provide access to renewable resource areas.
- Interconnect existing or proposed federal transmission corridors.
- Enable future upgrades of existing transmission corridors.

Government agencies evaluating transmission proposals within designated corridors can "tier off" of the PEIR produced by the Energy Commission during the designation process by referencing the PEIR to focus their own environmental analysis on site-specific issues.[3] For

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[2] The Renewable Energy Transmission Initiative (RETI) is a statewide initiative to help identify the transmission projects needed to accommodate California's renewable energy goals, support future energy policy, and facilitate transmission corridor designation and transmission and generation siting and permitting. RETI is an open and transparent collaborative process in which all interested parties are encouraged to participate.

[3] "Tiering" refers to the coverage of general matters in broader EIRs (such as on general plans or policy statements) with subsequent narrower EIRs or ultimately site-specific EIRs incorporating by reference the general discussions and concentrating solely on the issues specific to the EIR subsequently prepared. Tiering is appropriate when the sequence of EIRs is:

(a) From a general plan, policy, or program EIR to a program, plan, or policy EIR of lesser scope or to a site-specific EIR;

(b) From an EIR on a specific action at an early stage to a subsequent EIR or a supplement to an EIR at a later stage. Tiering in such cases is appropriate when it helps the Lead Agency to focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe.

example, a California investor-owned utility (IOU) could work first with the Energy Commission and local governments during the designation process to identify a feasible transmission corridor, including appropriate mitigation options. Later, they would seek California Public Utilities Commission (CPUC) approval to build transmission lines within the designated corridor. The CPUC would be able to expedite its environmental review process by tiering off of the information in the PEIR.

If respondents have questions about the information being requested, or find a part of these instructions to be ambiguous, Energy Commission staff will work with the transmission system owners to clarify what information is being requested. General questions about the forms or instructions should be directed to Mark Hesters at mhesters@energy.state.ca.us or (916) 654-5049.

Source: California Environmental Quality Act Guidelines, Section 15385, available at: http://ceres.ca.gov/topic/env_law/ceqa/guidelines/15350-15387_web.pdf.

GENERAL INSTRUCTIONS FOR TRANSMISSION SUBMITTALS

When to File

In adopting these forms and instructions, the California Energy Commission (Energy Commission) specifically requires the relevant parties to file the specified transmission-related data by Monday, March 16, 2009. The data do not have to be distributed to the Integrated Energy Policy Report service list.

Electric transmission system owners that require additional time may request an extension by submitting a written request to the Executive Director, as described in California Code of Regulations, Title 20, Article 2, Section 1342.

At a later date, the IEPR Committee may direct electric transmission system owners to file additional data needed to assess particular scenarios, topical issues, or policy proposals under consideration.

Who Must File

All electric transmission system owners are required to file a general description of their transmission system and specific information on limits to importing electricity into their bulk transmission grid, limitations on moving power within their bulk grid, transmission constraints that may limit their ability to meet state renewable energy procurement goals, and transmission corridor needs. Agencies may submit data for their members. For example, the Transmission Agency of Northern California may file on behalf of several electric transmission system owners. All electric transmission system owners that are planning strategic bulk transmission project upgrades or are the lead agency for such projects are required to provide the project information requested on the transmission forms or report specifications.

Please note: Where the information is available through another forum, electric transmission system owners are asked to identify a contact person (name, phone number, and e-mail address) and a Web link, where appropriate.

How to File

The Energy Commission encourages data filing by e-mail attachment if the attachment is 4 MB or less. When naming your attached file, please include your name or your organization's name.

If sending by electronic mail without a request for confidentiality, send to:

Docket@energy.state.ca.us
Please include "Docket #09-IEP-1D Transmission Planning" in the subject line.

If sending by mail without a request for confidentiality, send to:
California Energy Commission
Docket Unit
Attn: Docket 09-IEP-1D
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

Parties submitting electronic data by mail are requested to submit the electronic file containing the data and documentation in Microsoft Word, Microsoft Excel or Adobe PDF format, on a common media format such as CD-ROM or DVD-ROM.

If you are requesting confidentiality for any part of your submittal, please read and carefully follow the instructions in Appendix A.

SPECIFIC INSTRUCTIONS FOR ELECTRIC TRANSMISSION SUBMITTALS

The transmission filing requirements have been divided into four categories, and each transmission owner (or its agent) is required to address each category. Since the majority of this information will be narrative text, transmission owners are asked to submit this information in Word or Adobe PDF electronic format. For merchant transmission projects, the interconnecting utility/utilities should file the required information to the extent possible. The following list includes, but is not limited to, some of the projects that transmission owners are required to file information for[4]:

Project	Transmission Owner
Desert Southwest Transmission Project	Imperial Irrigation District
Green Path Project North	Los Angeles Department of Water & Power
Green Path Projects (Other than North)	Imperial Irrigation District
Intermountain Power Plant DC Transmission Line Upgrade	Los Angeles Department of Water & Power
TransWest Express Project	Southern California Edison
Lake Elsinore Advanced Pumped Storage Project	Southern California Edison and San Diego Gas & Electric
Canada/Pacific Northwest to Northern California Project	Pacific Gas and Electric
Central California Clean Energy Transmission Project	Pacific Gas and Electric
Sea Breeze DC Cable Project	Pacific Gas and Electric
Northern Lights	Southern California Edison and Pacific Gas and Electric
Alpha, Delta, and Zeta	Transmission Agency of Northern California

[4] Where a project interconnects to multiple transmission owners, the Energy Commission encourages the transmission owners to coordinate their responses to avoid duplication of effort.

All electric transmission system owners are required to file specific data on their bulk transmission network and on specific projects identified in their transmission plans. These data include descriptions of the transmission facilities or paths limiting power imports into their bulk transmission network, descriptions of the transmission facilities or paths limiting the transfer of power within their bulk transmission network, transmission limits that constrain the electric transmission system owners' ability to meet legislated renewable resource procurement requirements, and anticipated corridor needs for bulk transmission facilities that are 200 kilovolt (kV) or above in capacity or are under the control of the California Independent System Operator.

Where the information is available through another forum, electric transmission system owners are asked to identify a contact person (name, phone number, and e-mail address) and a Web link, where appropriate.

Data Requests

Each electric transmission system owner shall submit a description of its bulk electric system and its latest transmission expansion plan. In addition, for those major projects recommended in the *2005 Strategic Plan*[5] and the *2007 Strategic Plan*[6], please provide a status update (including a timeline with major milestones and a discussion of major issues affecting that timeline). The electric system description and plan shall include the following four items:

1. The electric transmission system owner's most recent transmission expansion plan. This plan should describe in detail all of the transmission facilities over 100 kV that the transmission owner needs to:
    a. Meet applicable reliability and planning standards.
    b. Reduce congestion.
    c. Interconnect new generation.
    d. Meet state policy goals such as the Renewables Portfolio Standard or aging power plant retirement/once-through cooling goals.

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[5] Major projects recommended in the *2005 Strategic Transmission Investment Plan* are SCE's Palo Verde-Devers No. 2 Transmission Project' SDG&E's Sunrise Powerlink; SCE's Tehachapi Transmission Segments 1, 2, and 3; Imperial Valley Transmission Upgrades; and the Trans Bay Cable Project.

[6] Major projects recommended in the *2007 Strategic Transmission Investment Plan* include the five projects recommended in the *2005 Strategic* Plan plus the following additional projects: PG&E's Central California Clean Energy Transmission Project; The Nevada Hydro Company's transmission component of the Lake Elsinore Advanced Pumped Storage Project (AKA the Talega-Escondido/Valley-Serrano 500 kV Interconnect Project); the LADWP and IID Green Path Coordinated Projects; The LADWP Tehachapi Transmission Project; and the SCE Tehachapi Renewable Transmission Project.

2. A description of the transfer capabilities for transmission lines or transmission paths delivering electric power *into* the electric transmission system owner's grid.

    a. The description shall include the size (for example, megavolt ampere [MVA] or megawatt [MW]) and length of the lines or lines included in the path and the substations to which the line connects.

    b. A description of any planned upgrades to the facilities that are used to import power into the electric transmission system owner's grid that are expected to be operational between January 2009 and December 2018, including:

        i. Descriptions of the upgrades including costs, benefits, maps, and the MW impact of the upgrades on transfer capabilities.

        ii. Descriptions of the alternatives considered in developing the upgrades.

    c. Any maintenance or construction that could impact transfer capabilities or the ability to move power over a path between January 2009 and December 2011.

    d. A description of any planned transmission facilities that would create a new transmission path or transmission line to import electric power into the electric transmission system owner's bulk electric network that are expected to be operational between January 2009 and December 2018, including:

        i. Descriptions of the facilities, including costs, benefits, maps, and the MW impact of the upgrade on transfer capabilities.

        ii. Descriptions of the alternatives, including non-wires alternatives, considered in developing the upgrades.

    e. A general description of any planned upgrades to the transmission network that imports electric power into the electric transmission system owner's bulk transmission grid that are expected to be operational after December 2018.

3. A description of the transfer capabilities for the bulk transmission lines or bulk transmission paths limiting the delivery of electric power *within* the electric transmission system owner's grid.

    a. The description shall include the size (MVA, MW) and length of the line or lines included in the path and the substations to which the line connects.

    b. A description of any upgrades to the facilities that are used to import power into the electric transmission system owner's grid that are expected to be operational between January 2009 and December 2018, including:

        i. Descriptions of the facility's or upgrade's costs, benefits, maps, and the megawatt impact of the upgrade on transfer capabilities.

        ii. Descriptions of the alternatives, such as non-wires alternatives, considered in developing the upgrades.

c. Any maintenance or construction that could impact transfer capabilities within the electric transmission system owner's bulk transmission grid between January 2009 and December 2011.

d. A description of any planned transmission facilities that would create a new means to transfer electric power within the electric transmission system owner's bulk transmission network that are expected to be operational between January 2009 and December 2018, including:

    i. Descriptions of the facility's or upgrade's costs, benefits, maps, and the MW impact of the upgrade on transfer capabilities.

    ii. Descriptions of the alternatives, such as non-wires alternatives, considered in developing the upgrades.

e. A general description of any planned upgrades to the transmission network that transports electric power within the electric transmission system owner's bulk transmission network that are expected to be operational after December 2018.

4. A description of the bulk transmission facilities needed for meeting state mandated electricity policy goals such as, renewable energy requirements, replacing aging power plants[7], complying with proposed State Water Resources Control Board policies for phasing out power plants that use once-through cooling[8] or eliminating or reducing local capacity requirements.

    a. The description shall include the size (MVA, MW) and length of the lines or lines included in the path and the substations to which the line connects.

    b. A description of any upgrades to the facilities in the electric transmission system owner's grid that are expected to be operating between January 2009 and December 2018, including:

        i. Descriptions of the upgrades including costs, benefits, maps, and the MW impact of the upgrade on transfer capabilities.

        ii. Descriptions of the alternatives, such as non-wires alternatives considered in developing the upgrades.

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[7] See the Energy Commission's Attachment A to the Notice of Committee Workshop on the Aging Power Plant Study, Proposed List of Plants for APPS Analysis, May 28, 2004. http://www.energy.ca.gov/2004_policy_update/notices/2004-05-28_ATT_A_REV_LIST.PDF

[8] See Page 2 of the State Water Resources Control Board's Scoping Document "Water Quality Control Policy on the Use of Coastal and Estuarine Waters For Power Plant Cooling," March 2008. http://www.waterboards.ca.gov/plans_policies/docs/coastal_estuarine/scope_doc031808.pdf

c. A general description of any planned upgrades expected to begin operating after December 2018.

Each electric transmission system owner shall evaluate its needs for transmission corridors on non-federal lands by addressing the following three items:

5. For those point-to-point electrical transfer needs identified in the sections (1-4) above, please discuss potential corridor needs in relation to the following:

    a. Opportunities to link with existing federally designated corridors or potential federal corridors identified under Section 368 of the Energy Policy Act of 2005.

    b. Opportunities to provide transmission capacity to develop the renewable generation resources needed to meet the state's Renewables Portfolio Standard (RPS) goals.

    c. Opportunities to import additional economical electricity from out of state.

    d. Opportunities to export renewable-based generation outside California.

    e. Opportunities to improve the reliability or reduce the congestion of the state's electricity system.

    f. Opportunities to upgrade existing transmission lines.

    g. Opportunities to meet future growth in load.

    h. The potential to impact sensitive lands that may not be appropriate locations for energy corridors – including, but not limited to, state and national parks, state and national designated wilderness and wilderness study areas, state and national wildlife refuges and areas, critical inventoried roadless areas in national forests, habitat conservation plan areas, and special habitat mitigation areas.

    i. Consideration of the Garamendi Principles (See Appendix B) as identified in Senate Bill (SB) 2431 (Garamendi, Chapter 1457, Statutes of 1988) and as noted in SB 1059, Section 1 (Escutia and Morrow, Chapter 638, Statutes of 2006), in the case of existing corridors.

    j. Any work previously done with local agencies and any geographical areas of sensitivity that may have been identified.

    k. Any other known major issues that have the potential to impact a future corridor designation.

6. If you have no plans for proposing a transmission corridor, please identify the circumstances or planning timeframes where you would opt to obtain a transmission corridor designation from the Energy Commission before applying for approval to build (or participate in) a transmission line project.

7. If you would not consider applying to the Energy Commission for a transmission corridor designation, please explain why not.

APPENDIX A:
HOW TO REQUEST CONFIDENTIALITY

The Executive Director of the Energy Commission has responsibility for determining what information submitted with an application for confidentiality will be deemed confidential. Parties who seek such a designation for data they submit must make a separate, written request that identifies the specific information and provides a discussion of why the information should be protected from release, the length of time such protection is sought, and whether the information can be released in aggregated form.

Certain categories of data provided to the Energy Commission, when submitted with a request for confidentiality, will be automatically designated as confidential and do not require an application. The types of data that are eligible and the process for obtaining this confidential designation are specified in California Code of Regulations, Title 20, Section 2505(a)(5). Note that the Energy Commission has its own regulations distinct from those governing the CPUC, and CPUC determinations on confidentiality are not applicable to data submitted to the Energy Commission.

Data that are not included in these categories, but that the filer believes are entitled to confidential treatment, should be submitted when due along with an application for confidential designation so that the Executive Director can review the information and make a determination about its confidential status. To do this, please carefully read and follow the instructions below.

What a Confidentiality Application Must Have

The application for confidentiality must include three attributes:

- A hard copy of the application must be submitted to the Executive Director:

  Melissa Jones, Executive Director
  California Energy Commission
  1516 Ninth Street MS-39
  Sacramento, CA 95814-5504

- The information being provided to the Energy Commission must be submitted electronically in Word, Excel or Adobe PDF format and on a common media format such as CD-ROM or DVD-ROM. This information should be marked electronically and externally as "Docket #09-IEP-1D." The confidential data categories must be clearly and properly labeled. Note: each IEPR topic area has its own sub-docket; transmission plans are filed in sub-docket "D".

- A signed "penalty of perjury certification" must be included in hard copy and electronic format. Suggested standard language is as follows:

  "I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge. I also certify that I am authorized to make the application and certification on behalf of (ABC Utility or Corporation)."

In addition, an application for confidentiality may be deemed incomplete and returned to the applicant if the application does not contain the following information:

- Identification of the information being submitted, including title, date, size (for example, pages, sheets, MB), and docket number
- Description of the data or information for which confidentiality is being requested (for example, particular contract categories, specific narratives, and periods)
- A clear description of the length of the time series of data and the period for which confidentiality is being sought, with an appropriate justification, for each confidential data category request
- Applicable provisions of the California Public Records Act (Government Code Section 6250 et seq.), and/or other laws, for each confidential data category request
- A statement attesting that a) the specific records to be withheld from public disclosure are exempt under provisions of the Government Code, or b) the public interest in non-disclosure of these particular facts clearly outweighs the public interest in disclosure
- On Excel forms provided with data that may be determined to be confidential, identification of specific cells using yellow fill that are consistent with the confidentiality application

What Happens if an Application Is Incomplete

Energy Commission staff will not docket applications deemed incomplete in these three respects. If an application is deemed incomplete, the application will be returned, and the information will be placed in a confidential "suspense" file. The filer will be notified by mail and e-mail about deficiencies in the application. The applicant has 14 calendar days to correct defects in the application and return an amended application to the Energy Commission.

After 14 days, all information associated with a still-incomplete application for confidentiality (based on the three attributes listed above) will be deemed publicly disclosable and will be docketed accordingly.

Determinations and Additional Information

The Executive Director decides what information will be deemed confidential and provides the determination in a signed confidentiality determination letter. The applicant has 14 calendar days to appeal this decision.

An applicant can request confidentiality at any time. The Energy Commission strongly encourages filers to provide data and any confidentiality requests concurrently.

More specific questions about confidentiality may be directed to Kerry Willis at kwillis@energy.state.ca.us or (916) 654-3967.

APPENDIX B:
GARAMENDI PRINCIPLES

In 1988, recognizing both the growing importance of transmission with the interconnection of independent power producers and the escalating conflicts between transmission-owning and transmission-dependent utilities, the California Legislature passed Senate Bill (SB) 2431 (Garamendi, Chapter 1457, Statutes of 1988), which contained the following findings concerning the role of transmission in California's future development:

(a) The Legislature finds and declares that establishing a high-voltage electricity transmission system capable of facilitating bulk power transactions for both firm and nonfirm energy demand, accommodating the development of alternative power supplies within the state, ensuring access to regions outside the state having surplus power available, and reliably and efficiently supplying existing and projected load growth, are vital to the future economic and social well being of California.

(b) The Legislature further finds and declares that the construction of new high-voltage transmission lines within new rights-of-way may impose financial hardships and adverse environmental impacts on the state and its residents, so that it is in the interests of the state, through existing licensing processes, to accomplish all of the following:

1. Encourage the use of existing rights-of-way by upgrading existing transmission facilities where technically and economically justifiable.

2. When construction of new transmission lines is required, encourage expansion of existing rights-of-way, when technically and economically feasible.

3. Provide for the creation of new rights-of-way when justified by environmental, technical, or economic reasons, as determined by the appropriate licensing agency.

4. Where there is a need to construct additional transmission, seek agreement among all interested utilities on the efficient use of that capacity.

In directing the Energy Commission to conduct an investigation and prepare a report outlining recommended policies and actions, SB 2431 plainly stated that the purpose of the report was to facilitate effective, long-term transmission line corridor planning.[9] One of the major findings of the report was that utilities should take appropriate mitigation measures to reduce the environmental impacts of approved projects.[10] The report also identified the absence of coordinated transmission and land-use planning as a major impediment to transmission

[9] California Energy Commission, *Transmission System and Right of Way Planning for the 1990's and Beyond*, March 1992, Publication P700-91-005, p. 1.

[10] Id at p. 7.

development in California and called for a process to identify environmentally sensitive areas, acceptable areas, and areas where urban encroachment into transmission rights-of-way could pose problems.[11] The basic principles and policies expressed in this effort formed a sound foundation for assessing and designating transmission corridors then and are still persuasive today, nearly 20 years after they were first articulated.

[11] Id at p. 15.